

BRUCE A. BLAKEMAN
County Executive



THOMAS A. ADAMS
County Attorney

COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY

January 31, 2025

Via ECF

Honorable Brian M. Cogan
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kahlon v. County of Nassau, et al.
Docket No. 24-CV-02439 (BMC)

Your Honor:

This office represents defendant County of Nassau (the “County”) in the above-referenced matter. For the reasons set forth below, the County respectfully requests that the Court grant an extension of time, from January 31, 2025 to February 7, 2025 to serve and file its motion for summary judgment pursuant to Fed. R. Civ. P. 56. However, as explained below, in view of today’s developments, Your Honor may decide to remand the entire case to Nassau County Supreme Court since the only remaining claims are State law claims.

This afternoon at 1:36 p.m. counsel for plaintiff Yossef Kahlon advised the Court that plaintiff has withdrawn all pending federal claims against defendant/counterclaim plaintiff Celine Boulben (“Boulben”) [DE 40] and requested that this action be remanded to State court. Previously, plaintiff withdrew all federal claims against the County, leaving only one state law malicious prosecution claim to be either disposed on the County’s motion or, should the Court deny this motion, it will be tried to a jury in federal court.

The County has no objection to the Court remanding this action to State court. However, since the County’s motion is to be served and filed by today, and since as a Sabbath observer I must leave the office today no later than 3:30 p.m., I respectfully request an extension of time to February 7, 2025 to serve and file the County’s motion in the event Your Honor decides to retain jurisdiction over the remaining State law claims. At 1:31 p.m. I sent an email request to all counsel asking that they join me in a telephone call to Chambers. Since I did not receive any response, I called Chambers several minutes ago and was directed to file this letter application.

Therefore, defendant County respectfully requests that the Court grant an extension of time, from January 31, 2025 to February 7, 2025 for the County to serve and file its motion.

As always, the County thanks Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: (via ECF)
All counsel of record